UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: VIAGRA (SILDENAFIL CITRATE) AND CIALIS (TADALAFIL) PRODUCTS LIABILITY LITIGATION	Case No.: 3:16-md-02691-RS MDL No. 2691 Case No:

JOHN W. REESE,
 	
        Plaintiff
 	
v.
 	
PFIZER INC. and ELI LILLY AND COMPANY,
 	
        Defendant.
	Master Short Form Complaint

Plaintiff, JOHN W. REESE, incorporates by reference the Plaintiffs' Master Long Form Complaint(s) filed with United States District Court for the Northern District of California in the matter of *In re: Viagra (Sildenafil Citrate) and Cialis (Tadalafil) Products Liability Litigation*. Plaintiff further shows the court as follows:

1. Defendant(s) against whom Complaint is made:

    a.   X   Eli Lilly and Company

    b.   X   Pfizer Inc.

    c.   ___   Other (specify Defendant) _____

2. Plaintiff's Full Name:

    a.   John William Reese _____

3. Name of the party or deceased who ingested Viagra/Revatio (sildenafil citrate) (hereinafter "Viagra") and/or Cialis/Adcirca (tadalafil) (hereinafter "Cialis") and suffered injury, if different than Plaintiff:

    a.   N/A _____

4. Name of additional or other Plaintiff, including loss of consortium Plaintiff(s) (i.e. administrator, executor, guardian, conservator):

    a.   N/A

5. Plaintiff's current city and state of residence:

    a.   Cantonment, Florida

6. District Court in which venue would be proper absent direct filing:

    a.   Northern District of Florida

7. City and state of Plaintiff or Decedent when he/she was diagnosed with melanoma:

    a.   Cantonment, Florida

8. Approximate dates that the Plaintiff or Decedent ingested Viagra (if applicable):

    a. Start date: 01/01/2011

    b. Stop date: 07/01/2014

9. Approximate dates that the Plaintiff or decedent ingested Cialis (if applicable):

    a. Start date: 01/01/2004

    b. Stop date: 01/01/2011

10. Date(s) that Plaintiff was diagnosed with melanoma which he/she alleges was caused by Viagra and/or Cialis:

    a.   06/25/2015

11. Date of death of Decedent, if applicable:

    a.   N/A

12. Master Complaint Adopted (check one or both):

    a. X Pfizer Master Complaint

    b. X Eli Lilly Master Complaint

13. Counts in the Master Complaint(s) brought by Plaintiff:

    a. Count 1 (Negligence): X

    b. Count 2 (Gross Negligence): X

    c. Count 3 (Negligence Per Se): X

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1   d. Count 4 (Unfair and Deceptive Trade Practices: Unfairness) __X__

2   e. Count 5 (Unfair and Deceptive Trade Practices: Fraud) __X__

3   f. Count 6 (Unfair and Deceptive Trade Practices: Unlawfulness) __X__

4   g. Count 7 (Strict Liability – Defective Design): __X__

5   h. Count 8 (Strict Liability – Failure to Warn): __X__

6   i. Count 9 (Failure to Test): __X__

7   j. Count 10 (Breach of Express Warranty): __X__

8   k. Count 11 (Breach of Implied Warranty): __X__

9   l. Count 12 (Fraudulent Misrepresentation and Concealment): __X__

10   m. Count 13 (Negligent Misrepresentation and Concealment): __X__

11   n. Count 14 (Fraud and Deceit): __X__

12   o. Count 15 (Willful, Wanton, and Malicious Conduct): __X__

13   p. Count 16 (Unjust Enrichment): __X__

14   q. Count 17 (Loss of Consortium): _____

15   r. Count 18 (Survival): _____

16   s. Count 19 (Wrongful Death): _____

17   t. Count 20 (Punitive Damages): __X__

18   u. Other: _____

19 14. Jury Demand

20   a. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff hereby demands a trial

21   by jury as to all claims in this action: Yes _X_ No ___

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23   Dated this the _29th_ day of May, 2019.

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Respectfully submitted on behalf of the Plaintiff,

_____

Jennifer Liakos (CA SBN 207487)
Hunter J. Shkolnik (Pro Hac Vice Pending)
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